#### BEFORE

# THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NO. 2014-246-E

	Petition of the Office of Regulatory Staff	)	JOINT PETITION TO INTERVENE
	to Establish Generic Proceeding Pursuant	)	
	to the Distributed Energy Resource	)	
	Program Act, Act No. 236 of 2014,	)	
	Ratification No. 241, Senate Bill No. 1189	)	

### INTRODUCTION

A Commission Docket was opened in this matter on June 6, 2014, and assigned the above-referenced Docket number. Joint Petitioners herein, are (i) Solbridge Energy LLC and (ii) Sustainable Energy Solutions, LLC. This <u>Joint Petition to Intervene</u>, filed pursuant to R. 103-825, of this Commission's Rules and Regulations, follows:

#### JOINT PETITIONERS

#### Solbridge Energy LLC.

- 1. Solbridge Energy LLC (hereinafter, "Solbridge Energy"), is a Limited Liability Corporation, organized under the Laws of the State of South Carolina with its principal place of business in Daniel Island, South Carolina.
- 2. Solbridge Energy is a Solar Development Company. Their business model is to (i) identify financially viable opportunities to build solar power plants (ii) package each solar power plant as a distinct project and investment opportunity, and (iii) manage the installation and ongoing operations of each project. Solbridge Energy focuses on projects ranging in size between one to twenty megawatts, located primarily along the Eastern Seaboard. Solbridge Energy, along with its development partner, controls a portfolio of approximately 100 MW.

#### Sustainable Energy Solutions, LLC.

- 1. Sustainable Energy Solutions, LLC (hereinafter, "Sustainable Energy"), is a Limited Liability Corporation, organized under the Laws of the State of South Carolina with its principal place of business in Charleston, South Carolina.
- 2. Sustainable Energy is a renewable energy solutions provider, with a focus on solar thermal and photovoltaic energy systems. Their services include planning, consulting, design, system installation and maintenance and project development.
- 3. As a developer, Sustainable Energy controls a pipeline of 150 MW of utility scale projects focused mainly in the Southeastern States, including Maryland, North Carolina, South Carolina and Arkansas. Sustainable Energy's projects range in size from 1 to 50 MW.

#### Joint Intervenors.

- 4. Although Solbridge Energy and Sustainable Energy are separate legal entities, they share: common business interest, financing sources and are joint development partners.
- 5. Because of their closely interrelated interests in this Docket, Solbridge Energy and Sustainable Energy are filing this, "Joint Petition to Intervene".
- 6. The Office of Regulatory Staff's legal counsel petitioned this Commission on June 5, 2014, pursuant to Section 58-40-20(F)(4) of the Act, to initiate a Docket in compliance with the Act's requirement of a generic Commission proceeding "...for purposes of implementing the requirements of this chapter with respect to the net energy metering rates, tariffs, charges and credits of electrical utilities, and specifically to establish the methodology to set any necessary charges and credits as required...."
- 7. S.C. Code Section 58-40-20(F)(4), requires that, "All interested parties shall be allowed to participate", and allow intervening parties to propose methodologies in the generic Commission proceeding.
- 8. Joint Petitioners' position is that they are, "interested parties", as contemplated in the Act, who have a material interest in the issues to be heard and addressed in this Docket, whose interest cannot be adequately represented by any other Party and Joint Petitioners should be allowed to Intervene and fully participate in this Docket.

- 9. Joint Petitioners' intervention is consistent with this Commission's long standing policy, "...in encouraging maximum public participation in issues before the Commission, and [Intervention] should be allowed so that a full and complete record... can be developed." (Order No.: 2005-725, in Docket No.: 2005-270-G, dated December 16, 2005).
- 10. Joint Petitioners should be allowed to intervene in this Docket, with full rights of cross examination, discovery and participation in the Hearing to be scheduled in this matter.

## JOINT PETITION TO INTERVENE

- 1. The granting of the Commission Solbridge Energy LLC's Petition to Intervene and Sustainable Energy Solutions, LLC's Petition to Intervene, filed jointly, is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed.
- 2. Solbridge Energy LLC and Sustainable Energy Solutions, LLC are represented by counsel in this proceeding:

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## WHEREFORE, Joint Petitioners pray for the following relief:

- (a) That this Joint Petition to Intervene be accepted and that Joint Petitioners be made parties of record;
- (b) That Joint Petitioners be allowed to participate fully in this proceeding and take such positions as they deem advisable; and
  - (c) For such other and further relief as is just and proper.

#### [Signature Page Follows]

Respectfully Submitted,

/S/

Richard L. Whitt **AUSTIN & ROGERS, P.A.** 508 Hampton Street, Suite 300 Columbia South Carolina, 29201 803-251-7442 Counsel for Joint Petitioners, Solbridge Energy LLC

July 30, 2014 Columbia, South Carolina and Sustainable Energy Solutions, LLC